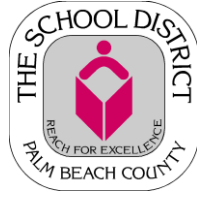


Audit of
Alternative Education Programs
December 9, 2016

Report #2016-11



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**Audit of
Alternative Education Programs
Table of Contents**

	Page
EXECUTIVE SUMMARY	i
PURPOSE AND AUTHORITY	1
SCOPE AND METHODOLOGY	1
BACKGROUND	2
CONCLUSIONS	
1. No Exceptions Noted in Instructional Time Requirements	5
2. No Exceptions Noted for Interim Alternative Educational Setting (IAES) Placement Duration	5
3. 87 (13%) of the Students Withdrawn From Sending Schools, But Not Registered at Receiving Schools	6
4. Documents Not Maintained for Students Exiting the Programs	8
5. Missing Documentation of Academic Assistance and Support Services for ESE Students	10
EXHIBITS	
1. Number of Days Without Schooling for Students While Transferring from “Home Schools” to “Alternative Schools”	12
2. Student Support Plan (PBSD 2007)	14
3. Sample “Behavior Intervention Exit Checklist”	16
APPENDIX	
Management’s Response	17

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Audit of
Alternative Education Programs

EXECUTIVE SUMMARY

Pursuant to the *Office of Inspector General's (OIG) 2015-16 Work Plan*, we have audited the Alternative Education Programs for July 1, 2015, through April 30, 2016. The primary objectives of the audit were to evaluate the program compliance in (1) assigning students to Alternative Education Schools, and (2) providing services and program components to students accordingly.

1. No Exceptions Noted in Instructional Time Requirements

The review of *Master Schedules* and *Attendance Rosters* for 10 sample students each from Academic Intervention Program and Behavior Intervention Program concluded that the amount of instructional times provided to the 20 sample students met the requirements of *State Board of Education Rules*.

Management's Response: Concur. (Please see page 17.)

2. No Exceptions Noted for Interim Alternative Educational Setting (IAES) Placement Duration

During the audit period, a total of 18 students were in IAES placements, with four students enrolled at non-District facilities, and 14 enrolled at the District's sites. Our review of the records for the 14 students enrolled at District's sites revealed full compliance with the 45-school-day requirement.

Management's Response: Concur. (Please see page 17.)

3. 87 (13%) of the Students Withdrawn From Sending Schools, But Not Registered at Receiving Schools

During July 2015 through April 2016, a total of 654 students were enrolled in the Alternative Education Programs. The review of assignment history of these 654 students disclosed that 87 (13%) of the students were withdrawn from their "home schools", but were not enrolled at the alternative schools until after one to 85 school days, with an average of seven school days. Consequently, these 87 students did not receive the mandated schooling services for an average of seven school days, while transferring from their "home schools" to an alternative school.

Management's Response: Concur. On-going training will be provided to the Placement Liaison and school based leaders. (Please see page 17 for the detailed response.)

4. Documents Not Maintained for Students Exiting the Programs

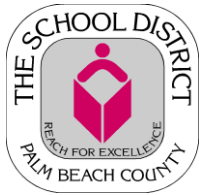
A total of 160 students exited the Alternative Education Programs during July 2015 and April 2016. The review of records for 13 sample students found that (a) there were no *Student Support Plans (PBSD 2007)* on file for all the 13 sample students, and (b) two of the 13 sample students were in the Behavior Intervention Program but did not have the required *Exit Criteria Checklist*. The *Student Support Plan* should contain the recommended educational strategies for the receiving school to assist the student for success. The *Exit Criteria Checklist* contains the information as a reminder for staff to ensure all the required records are completed and that the student has met the requirement for exiting the Behavior Intervention Program.

Management's Response: *The Student Support Plans (PBSD 2007) for three of the 13 sample students were not found in file. One student attended one week and never returned to the Alternative site. The Student Support Plan (PBSD 2007) does not apply to the other nine students, including (a) seven ESE students and (b) two students transferring from one alternative program to another alternative program. The Exit Criteria Checklist is not an official School District of Palm Beach County form/checklist. The Checklist is an internal monitoring tool for the Alternative Education Site to ensure students have met exit criteria. The Department of Educational Alternatives will (a) develop and implement a records management system for the five alternative school centers, and (b) provide training and compliance resource support to the alternative school sites. (Please see page 18 for the detailed response.)*

5. Missing Documentation of Academic Assistance and Support Services for ESE Students

During July 2015 and April 2016, a total of 151 Exceptional Student Education (ESE) students enrolled in Alternative Education Programs. Based on the *Individual Educational Plans (IEP)* for 54 sample ESE students, there should be a total of 963 required monthly reports, such as *Consultation Logs*, *Support Facilitation Logs*, and *Speech & Language Therapists Logs*, etc., maintained on file during the students' enrollment periods. However, 626 (65%) of the 963 required reports were missing and not available for our review.

Management's Response: *Concurs. As of July 1, 2016, the five alternative school centers are a direct report to the Division of Student Services/Equity and Access. Therefore, records management compliance for Alternative school centers has become a function of the Department of Educational Alternatives. The Department of Educational Alternatives will (a) develop and implement protocols for site records management, (b) train appropriate alternative school center staff on a monthly basis, and (c) conduct bi-weekly visits and Quality Improvement Reviews of the alternative school sites. (Please see page 19 for the detailed response.)*



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MEMORANDUM

TO: Honorable Chair and Members of the School Board
Robert M. Avossa, Ed.D., Superintendent of Schools
Chair and Members of the Audit Committee

FROM: Lung Chiu, CPA, Inspector General

DATE: December 9, 2016

SUBJECT: Audit of Alternative Education Programs

PURPOSE AND AUTHORITY

Pursuant to the *Office of Inspector General's (OIG) 2015-16 Work Plan*, we have audited the Alternative Education Programs for July 1, 2015, through April 30, 2016. The primary objectives of the audit were to evaluate the program compliance in (1) assigning students to Alternative Education Schools, and (2) providing services and program components to students accordingly.

SCOPE AND METHODOLOGY

The audit was performed in accordance with *Generally Accepted Government Auditing Standards* promulgated by the Comptroller of the United States. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit covered the Alternative Education Programs operated at the District's six Alternative Education Schools. To achieve the audit objectives, this audit included (a) interviewing appropriate department officials and school staff, (b) reviewing control procedures, and (c) reviewing the following documents and relevant information:

1. Applicable laws, rules, regulations, and procedures, including
 - *Florida Statutes Chapter 1003, Part V, Specialized Instruction for Certain Public K-12 Students*
 - *State Board of Education Rules*, specifically
 - o *Rule 6A-6.0524, FAC - Educational Alternatives Programs*
 - o *Rule 6A-6.03312, FAC - Discipline Procedures for Students with Disabilities*
 - *Section 504 of the Vocational Rehabilitation Act of 1973*
 - *Individuals with Disabilities Education Act ("IDEA") of 1990*

2. Applicable *School Board Policies*
 - 5.1812 - *Student Code of Conduct for Elementary Students*
 - 5.1814 - *Most Severe Consequences for Violent Acts*
 - 5.1817 - *Student Expulsion*
 - 5.1818 - *Student Early Reinstatement*
 - 5.50 - *Student Records*
 - 8.13 - *Dropout Prevention/Alternative Education/Juvenile Justice/Youth Services Program*
3. School District's *Department of Educational Alternatives Juvenile Justice/Youth Services Programs Manual* (Adopted August 27, 2014)
4. Records for sample students entering or exiting the Alternative Education Programs during July 1, 2015, through April 30, 2016.

Audit conclusions were brought to the attention of staff during the audit so that necessary corrective actions could be implemented immediately. The draft audit report was sent to the management for review and comments. Management response is included in the Appendix. We would like to thank staff for their cooperation and courtesy extended to us during the audit. The final draft report was presented to the Audit Committee at its December 9, 2016, meeting.

BACKGROUND

Alternative Education Programs

Alternative Education Programs, or Alternative Learning Experience (ALE) Programs, are not necessarily constrained to classroom setting. These programs may be offered on a full-time or part-time basis at general education school campuses, alternative school sites, or at any location that the School Board approves as a school center. During Fiscal Year 2016, Alternative Education Programs were offered at six District's locations and eight other locations operated in conjunction with District staff and contracted private providers or other government agencies.

Alternative Education Programs Operated at District's Schools

School	Enrollment ⁽¹⁾			Budget ⁽²⁾		
	FY14	FY15	FY16	FY14	FY15	FY16
Crossroads Academy ^(Note)	197	205	232	\$2,449,127	\$2,516,914	\$2,493,285
Elementary Transition-North	2	12	10	\$192,474	\$196,442	\$195,749
Gold Coast School of Choice	153	121	138	\$1,750,778	\$1,720,242	\$1,600,736
Intensive Transition-South	99	122	92	\$1,687,924	\$1,643,345	\$1,508,817
Rivera Beach Prep & Achievement Academy	167	149	155	\$1,972,831	\$2,053,805	\$2,017,841
Turning Points Academy	133	171	160	\$2,440,883	\$2,526,017	\$2,474,061
Total	751	780	787	\$10,494,017	\$10,656,765	\$10,290,489

Sources: (1) Department of Educational Alternatives.

(2) Executive Summary of the 2014-15 Budget (All Funds) and Executive Summary of the 2015-16 Budget (All Funds).

Note: The budget for Crossroads Academy also includes the budget for Intensive Transition West. Crossroads Academy and Intensive Transition West were managed by one Principal and operated on the same campus.

**Alternative Education Programs
Operated at Other Locations
(District's Contractors/Other Government Agencies)**

Contractors or Other Government Agencies	Enrollment ⁽¹⁾			Budget ⁽²⁾		
	FY14	FY15	FY16	FY14	FY15	FY16
Alternative Program Central (Kelly Center)	64	64	65	\$95,668	\$67,950	\$67,934
Alternative Program North ⁽³⁾	0	0	0	\$67,391	\$68,502	\$68,534
High Ridge	211	208	184	\$417,778	\$427,759	\$355,697
Pace Center for Girls	84	87	91	\$321,320	\$366,390	\$380,000
Palm Beach Juvenile Correction	193	206	156	\$776,555	\$809,271	\$824,321
Palm Beach County Jail	138	149	100	\$665,403	\$674,347	\$587,448
PB Regional Juvenile Detention Center	709	756	692	\$711,502	\$596,220	\$589,269
Teen Parent Program	83	83	83	\$1,250,884	\$1,339,528	\$1,388,326
Total	1,482	1,553	1,371	\$4,306,501	\$4,349,967	\$4,261,529

Sources: (1) Department of Educational Alternatives.

(2) Executive Summary of the 2014-15 Budget (All Funds) and
Executive Summary of the 2015-16 Budget (All Funds).

(3) Alternative Program North had one teacher who provided support services for students enrolled at High Ridge and Kelly Center.

Objectives of Alternative Education Programs

Alternative Education Programs provide alternative learning environment and support for students with behavioral or academic challenges. According to the District's *Department of Educational Alternatives Juvenile Justice/Youth Services Programs Manual (Alternative Education Manual)*, two types of programs are provided by the District's Alternative Schools: (1) Behavior Intervention Programs, and (2) Academic Intervention Programs.

As outlined in the *Alternative Education Manual*, the objectives of the above programs are as follow:

Behavior Intervention Programs: *"The objective of Behavior Intervention Programs is to provide positive behavioral interventions to ensure educational opportunities for a student with behavioral challenges, allowing that student to make academic progress. At the same time, Behavior Intervention Programs instill and teach the foundational skills needed to make appropriate behavioral choices, by receiving regular feedback on academic and behavioral progress, counseling, and other student services that differ from traditional offerings provided at comprehensive schools."*

Academic Intervention Programs: *"Academic Intervention Programs provide academically challenged students the opportunity to:*

- *Stay in school and/or accumulate credits towards earning a high school diploma*
- *Improve socialization skills*
- *Improve academic performance*
- *Improve attendance*
- *Successfully progress through Student Progression Plan"*

Participation in Alternative Education Programs

State Board of Education Rules 6A-6.0524, Educational Alternatives Programs, provides the following regarding the assignment of students to alternative education programs,

“(1) Voluntary or assigned participation. Participation is voluntary and means that the student is not assigned to the program without parental or adult student permission.”

Student Enrollments

According to the Department of Educational Alternatives, during July 1, 2015, and April 30, 2016, a total of 654 students were enrolled in various Alternative Education Programs, and 160 students exited the programs.

Students Enrollment - Alternative Education Programs During July 1, 2015, and April 30, 2016

School/Program	Total Enrollment
Crossroads Academy	123
Elementary Transition - North	11
Gold Coast School of Choice	103
Intensive Transition - South	75
Intensive Transition – West	12
Riviera Beach Prep & Achievement Academy	158
Turning Point Academy	172
Total	654

Source: Department of Educational Alternatives

CONCLUSIONS

The audit produced the following major conclusions:

1. No Exceptions Noted in Instructional Time Requirements

Amount of Instructional Time Met the *State Board of Education* Requirements. *State Board of Education Rule 6A-6.0524, Educational Alternatives Programs* provides the following regarding instructional time,

“(3) Instructional periods. Instruction shall be provided for a minimum of two (2) instructional periods per day unless the student participates in a student support and assistance component rather than standard dropout prevention classes.”

Moreover, *State Board of Education Rule 6A-6.0527, Section (3)*, required a minimum of five hours of instruction per day for students in Behavior Intervention Program. However, *Rule 6A-6.0527* was repealed as of January 7, 2016. The District’s new *Alternative Education Procedure Manual* (revised March 2, 2016) requires that all students in Behavior Intervention Program “*shall receive a minimum of 300 instructional minutes (5 hours) per school day for a total of 1500 minutes per week.*”

Our review of *Master Schedules* and *Attendance Rosters* for 10 sample students from Academic Intervention Program and 10 sample students from Behavior Intervention Program concluded that, the amount of instructional times provided to the 20 sample students were at least five hours per day and met the requirements of *State Board of Education Rules 6A.0524* and *6A-0527* (repealed), and the District’s *March 2016 Alternative Education Procedure Manual* during the audit period.

Management’s Response: Concurs with the conclusions. (Please see page 17.)

2. No Exceptions Noted for Interim Alternative Educational Setting (IAES) Placement Duration

Students in IAES Placements Exited Before the 45 Days Limit. Pursuant to paragraph (6)(a) of *Rule 6A-6.03312 (Discipline Procedures for Students with Disabilities)*,

“(6) Special Circumstances and Interim Alternative Educational Setting (IAES)

(a) School personnel may remove a student to an IAES for not more than forty-five (45) school days without regard to whether the behavior is determined to be a manifestation of the student’s disability, if the student:

1. Carries a weapon to or possesses a weapon at school, on school premises, or to a school function under the jurisdiction of a state education agency or a school district;

2. *Knowingly possesses or uses illegal drugs or sells or solicits the sale of a controlled substance, while at school, on school premises, or at a school function under the jurisdiction of a state education agency or a school district; or*

3. *Has inflicted serious bodily injury upon another person while at school, on school premises, or at a school function under the jurisdiction of a state education agency or a school district.*”

During the audit period, a total of 18 students were in IAES placements. The review of the student assignment records noted that four students were enrolled at non-District facilities, and 14 were enrolled at the District’s sites. Our review of the records for the 14 students enrolled at District’s sites revealed full compliance with the 45-school-day requirement. Specifically, (a) nine students exited the program within 45 days, and (b) the other five students remained in the programs after the 45-day limit at the request of their parents.

Management’s Response: Concurs with the conclusions. (Please see page 17.)

3. 87 (13%) of the Students Withdrawn From Sending Schools, But Not Registered at Receiving Schools

Pursuant to *Alternative Education Manual*,

“The home school should not withdraw a student until the Department of Educational Alternatives Program notifies the home school of the student’s enrollment.”

During July 2015 through April 2016, a total of 654 students were enrolled in the Alternative Education Programs. OIG reviewed the assignment history of these 654 students in the District’s Student TERMS database. The review disclosed that 87 (13%) of the students were withdrawn from their “home schools”, but not enrolled at the alternative schools (please see Exhibit 1 on pages 12-13). The lapse between leaving the original school and the enrolling at the new school ranged from one to 85 school days, with an average of seven school days. Consequently, these 87 students did not receive the mandated schooling services for an average of seven school days, while transferring from their “home schools” to an alternative school.

Recommendation

To ensure all students receive the required educational services and compliance with the *Alternative Education Manual*, the Department of Educational Alternatives should coordinate with the sending and receiving schools to ensure that students have registered in the Alternative Education schools before withdrawing them from the home schools.

Management's Response: *Concurs with the conclusions.*

1. *The comprehensive schools have the autonomy to make school based decisions regarding enrollment and withdrawal of students. The Department of Educational Alternatives is not advised by the sending school when a student has been withdrawn before the placement process has been finalized.*

While there are several variables that may impact student enrollment into the receiving alternative school center, withdrawal from the SAC school before the placement has been executed should not be one of the variables per the guidelines.

Some of the variables that may cause a delay in enrollment into the alternative setting may include but is not limited to the following:

- *Student is enrolled/committed into a Department of Juvenile Justice Residential Program before the alternative placement occurs*
- *Parent/student may exercise the right to an optional educational setting (i.e. Private or Charter School)*
- *Parent/student refuses to enroll in the alternative school the student has been assigned to attend due to safety and other concerns*
- *Parent refuses to allow the student to commute via public transportation in order to attend an alternative school and is unable to transport student themselves, resulting in a transportation hardship for the family*

2. **Corrective actions taken or to be taken**

The Department of Educational Alternatives will continue to provide support staff, the Placement Liaison, who convenes and facilitates the staffing consideration meetings for student transition throughout the District. During the meetings, it is the function and responsibility of the placement liaison to coordinate with the sending and receiving school centers to ensure that the students have been registered prior to withdrawal from the comprehensive school center.

- *The Placement Liaisons will receive a refresher training regarding follow up procedures after the consideration meeting*
- *The Department will provide training to all school based leaders on the protocols for placement as outlined in the compliance manual*

3. **Targeted completion date:** *On-going.*

(Please see page 17.)

4. Documents Not Maintained for Students Exiting the Programs

A total of 160 students exited the Alternative Education Programs during July 2015 and April 2016. District's *Alternative Education Manual*, states that,

- Prior to or during the exit meeting, the Behavior Intervention Program and Academic Intervention Program “*must complete a Student Support Plan (PBSD 2007) and a Student Exit Report (PBSD Form 1605).*”
- For students exiting the Behavior Intervention Program, “*an exit criteria checklist will be completed at each Department of Educational Alternatives school sites and become part of the exit documentation.*”
- “*The Department of Educational Alternatives shall forward all documentation of interventions and progress monitoring to the receiving comprehensive school.*”

Our review of records for 13 sample students, who exited the program during July 2015 and April 2016 found that,

- a) There were no *Student Support Plans (PBSD 2007)* on file for the 13 sample exiting students. The *Plan* (please see Exhibit 2 on pages 14-15) should include the recommended educational strategies for the receiving school to assist the student for success. Without the *Student Support Plan*, there is no assurance all the recommended strategies and accommodations will be provided to the student at the new school.
- b) Two of the 13 sample exiting students were in Behavior Intervention Program; but both of them did not have the required *Exit Criteria Checklist*. The *Checklist* (please see Exhibit 3 on page 16) contains the information as a reminder for staff to ensure all the required documentation/records are completed and the student has met the requirement for exiting the Behavior Intervention Program.

Recommendation

To ensure students are provided with the appropriate support services and programs from the receiving comprehensive school, the Department of Educational Alternatives should ensure that all the required documentation is completed and maintained by the Alternative School Sites and is forwarded to the receiving comprehensive schools accordingly.

Management's Response: *Non-concurrence with the conclusions.*

1. (a) *Exhibit 2 ~ (The Plan) does not apply in the case of ESE students.*

Seven of the 13 students identified in the random sample were ESE students and therefore PBSD 2007 does not apply to ESE students. The student IEP documents all support services delineated for ESE students.

Exhibit 2 ~ (The Plan) does not apply for students transferring from one alternative program to another alternative program, they are not exiting but are receiving further services.

(b) Exhibit 3 ~ (The Checklist) referenced in the preliminary and tentative draft is not an official School District of Palm Beach County form/checklist. The Exit Criteria Checklist mentioned in the current manual refers to an internal monitoring tool for the Alternative Education Site to ensure students have met exit criteria. As listed in the manual, the official documents needed for general education students exiting alternative programs include the following School District of Palm Beach County forms:

- *PBSD 1051*
- *PBSD 1605*
- *PBSD 2007*

<i>13 Identified Students</i>	
<i>7 ESE Students</i>	<i>Form 2007 not applicable</i>
<i>2 Student Transfers</i>	<i>Form 2007 not applicable Students transferred from a Behavior Program to an Academic Program</i>
<i>3 Reg. Academic Placement Students</i>	<i>Form 2007 not found in files (see corrective actions to be taken)</i>
<i>1 Reg. Academic Placement Student</i>	<i>Student attended one week and never returned to the Alternative site</i>

The Department of Educational Alternatives developed, implemented and has consistently documented student exit transitions via Department Exit Database for the past three years.

2. Corrective actions taken or to be taken

At the time of the audit, the aforementioned schools were direct reports to the Area Offices. Therefore, the oversight of records maintenance for the five alternative schools was not a function of the Department of Educational Alternatives.

The Department of Educational Alternatives needs the authority to provide direct compliance oversight for the five existing alternative school centers. Thereby ensuring that all required documentation is completed and maintained by the Alternative School Sites and is forwarded to the Comprehensive School Sites through increased levels of Department compliance oversight.

- *Alternative School Administrators and key staff will be trained regarding record keeping procedures*

- Department of Educational Alternatives compliance staff will develop and implement a records management system for the five alternative school centers
- Department of Educational Alternatives will provide compliance resource support throughout the school year and during exit consideration meetings

3. Targeted completion date: On-going.

(Please see page 18.)

OIG Comment: Although management indicated nonconcurrency in the response, there was no new information to substantiate the nonconcurrency. Management response and the planned corrective actions, in fact, supported our finding.

5. Missing Documentation of Academic Assistance and Support Services for ESE Students

State Board of Education Rule 6A-6.0521(2)(f)(7), states that student records should contain “documentation of the academic assistance and support services provided students and teachers in student support and assistance components.”

During July 2015 and April 2016, a total of 151 Exceptional Student Education (ESE) students were enrolled in Alternative Education Programs. As required by the *Individual Educational Plans* (IEP), the 54 sample ESE students should have a total of 963 required monthly reports, such as *Consultation Logs*, *Support Facilitation Logs*, and *Speech & Language Therapists Logs*, etc., maintained on file during the students’ enrollment periods. However, 626 (65%) of the 963 required reports were missing and not available for our review.

School	# of ESE Students		Total # of Documentation/Reports * For Sample Students		
	Total	Sampled	# of Reports Required	# of Reports Maintained	# of Reports Missing
Intensive Transition West	8	2	50	14	36
Elementary Transition	2	2	7	0	7
Intensive Transition South	19	6	34	21	13
Turning Point	54	14	243	26	217
Gold Coast	19	10	169	41	128
Crossroads	34	14	220	122	98
Riviera Beach Prep.	15	6	240	113	127
Total	151	54 (36%)	963	337 (35%)	626 (65%)

* Required reports vary; they may include *Consultation Logs*, *Support Facilitation Logs*, and *Speech & Language Therapists Logs*, etc.

Recommendation

Academic assistance and support services should have been provided to students, and be adequately documented as required. Without supporting documentation, there is no assurance that the students received the appropriate academic and support services.

Management's Response: *Concur with the conclusions.*

1. *At the time of the audit, the aforementioned schools were direct reports to the Area Offices. Therefore, the oversight of records maintenance for the five alternative schools was not a function of the Department of Educational Alternatives.*

During the audit process, compliance staff from the Department of Educational Alternatives conducted an internal file review of ESE student records at each of the alternative school centers. While each site location maintained a unique records management system, many of the referenced documents were located and provided to the Inspector General's Office representative via email (documentation to be provided).

2. **Corrective actions taken or to be taken**

As of July 1, 2016, the five alternative school centers are a direct report to the Division of Student Services/Equity and Access. Therefore, records management compliance for the Alternative school centers has become a function of the Department of Educational Alternatives.

- *The corrective measures taken by this office during the audit process were inclusive of a compliance file review of student records*
- *The school's administration was notified of the necessary compliance follow up action steps*
- *The Department of Educational Alternatives ESE compliance staff will visit the Alternative School Sites on a bi-weekly basis complete Quality Improvement Reviews*
- *The Department of Educational Alternatives resource staff will train appropriate alternative school center staff on a monthly basis*
- *The Department of Educational Alternatives will develop and implement protocols for site records management*

3. **Targeted completion date:** *On-going.*

(Please see page 19.)

– End of Report –

Exhibit 1
of Days Without Schooling for Students
While Transferring from “Home Schools” to Alternative Schools

Student	Sending (Home) School	Receiving (Alternative) School	Date Withdrawn from Sending (Home) School (A)	Date Enrolled at Receiving School (B)	# of School Days Without Schooling (B) - (A)
1	Palm Beach Regional	Intensive Transition West	4/13/2015	10/27/2015	85
2	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	7/23/2015	9/30/2015	29
3	Inlet Grove	Riviera Beach Prep & Achievement Academy	6/5/2015	9/24/2015	25
4	Glades Central High	Crossroads Academy	10/29/2015	12/9/2015	24
5	William T. Dwyer High	Riviera Beach Prep & Achievement Academy	6/5/2015	9/15/2015	19
6	Worthington High School	Riviera Beach Prep & Achievement Academy	10/22/2015	11/18/2015	17
7	Palm Beach Regional	Intensive Transition South	1/4/2016	1/27/2016	15
8	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	6/5/2015	9/8/2015	15
9	LC Swain Middle	Intensive Transition South	12/2/2015	1/6/2016	13
10	Worthington High School	Riviera Beach Prep & Achievement Academy	8/18/2015	9/8/2015	13
11	Forest Hill High	Turning Points Academy	4/7/2016	4/26/2016	12
12	High Ridge	Intensive Transition South	2/10/2016	2/29/2016	11
13	Glades Central High	Crossroads Academy	3/11/2016	4/5/2016	11
14	Florida Future Academy	Turning Points Academy	1/14/2016	2/12/2016	11
15	Pace Center	Riviera Beach Prep & Achievement Academy	8/14/2015	9/1/2015	11
16	Forest Hill High	Turning Points Academy	2/24/2016	3/10/2016	10
17	Pace Center	Gold Coast	1/26/2016	2/9/2016	9
18	Palm Beach Regional	Intensive Transition South	3/7/2016	3/28/2016	9
19	Palm Beach Regional	Turning Points Academy	7/22/2015	8/31/2015	9
20	John F Kennedy Middle	Turning Points Academy	10/27/2015	11/10/2015	9
21	Palm Beach Regional	Turning Points Academy	8/18/2015	8/31/2016	9
22	Palm Beach Regional	Turning Points Academy	9/18/2015	10/5/2015	9
23	John F Kennedy Middle	Turning Points Academy	10/27/2015	11/10/2015	9
24	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	2/11/2016	2/26/2016	9
25	Congress Middle	Gold Coast	1/25/2016	2/5/2016	8
26	County Jail	Intensive Transition South	1/20/2016	2/2/2016	8
27	Bear Lakes Middle	Turning Points Academy	2/17/2016	3/1/2016	8
28	John F Kennedy Middle	Turning Points Academy	2/26/2016	3/10/2016	8
29	Turning Point Academy	Turning Points Academy	6/5/2015	8/28/2015	8
30	John F Kennedy Middle	Turning Points Academy	2/26/2016	3/10/2016	8
31	Palm Beach Regional	Intensive Transition South	1/14/2016	1/27/2016	7
32	Glades Central High	Crossroads Academy	9/22/2015	10/5/2015	7
33	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	6/5/2015	8/26/2015	7
34	L.C. Swain Middle	Intensive Transition South	12/11/2015	1/6/2016	6
35	Glades Central High	Crossroads Academy	4/1/2016	4/11/2016	6
36	H.L. Watkins Middle	Turning Points Academy	12/7/2016	12/16/2016	6
37	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	2/19/2016	3/1/2016	6
38	Glades Central High	Crossroads Academy	1/19/2016	1/25/2016	5
39	Glades Central High	Crossroads Academy	11/20/2015	12/3/2015	5
40	Palm Beach Regional	Crossroads Academy	8/14/2015	8/24/2015	5
41	Pace Center	Riviera Beach Prep & Achievement Academy	1/4/2016	1/12/2016	5
42	Pace Center	Riviera Beach Prep & Achievement Academy	1/4/2016	1/12/2016	5
43	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	7/24/2015	8/24/2015	5
44	Bear Lakes Middle	Turning Points Academy	3/3/2016	3/10/2016	4

Exhibit 1
of Days Without Schooling for Students
While Transferring from “Home Schools” to Alternative Schools

Student	Sending (Home) School	Receiving (Alternative) School	Date Withdrawn from Sending (Home) School (A)	Date Enrolled at Receiving School (B)	# of School Days Without Schooling (B) - (A)
45	Palm Beach Regional	Turning Points Academy	10/14/2015	10/21/2015	4
46	Forest Hill High	Turning Points Academy	4/7/2016	4/14/2016	4
47	Forest Hill High	Turning Points Academy	11/18/2016	11/30/2016	4
48	Forest Hill High	Turning Points Academy	11/18/2015	11/30/2015	4
49	John I Leonard High	Turning Points Academy	04/20/2016	4/27/2016	4
50	Palm Beach Regional	Riviera Beach Prep & Achievement Academy	11/9/2015	11/18/2015	4
51	Pace Center	Riviera Beach Prep & Achievement Academy	9/4/2015	9/15/2015	4
52	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	2/22/2016	2/19/2016	4
53	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	11/2/2015	11/9/2015	4
54	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	11/2/2015	11/9/2015	4
55	William T. Dwyer High	Riviera Beach Prep & Achievement Academy	1/26/2016	2/1/2016	4
56	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	2/9/2016	2/17/2016	4
57	County Jail	Riviera Beach Prep & Achievement Academy	2/1/2016	2/8/2016	4
58	Worthington High School	Riviera Beach Prep & Achievement Academy	10/21/2015	10/28/2015	4
59	Boca Raton High	Intensive Transition South	4/7/2016	4/13/2016	3
60	Palm Beach Gardens High	Intensive Transition South	4/19/2016	4/25/2016	3
61	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	1/5/2016	1/11/2016	3
62	William T. Dwyer High	Riviera Beach Prep & Achievement Academy	2/16/2016	2/22/2016	3
63	William T. Dwyer High	Riviera Beach Prep & Achievement Academy	9/17/2015	9/24/2015	3
64	Conniston Middle	Gold Coast	1/19/2016	1/22/2016	2
65	Lake Worth Middle	Intensive Transition South	2/26/2016	3/2/2016	2
66	Odyssey Middle	Intensive Transition South	3/17/2016	3/29/2016	2
67	Pace Center	Intensive Transition South	1/21/2016	1/26/2016	2
68	Glades Central High	Intensive Transition West	3/28/2016	3/31/2016	2
69	Glades Central High	Crossroads Academy	10/2/2015	10/7/2015	2
70	Bear Lakes Middle	Turning Points Academy	2/24/2016	2/29/2016	2
71	Conniston Middle	Turning Points Academy	2/17/2016	2/22/2016	2
72	Emerald Cove Middle	Turning Points Academy	11/30/2015	12/3/2015	2
73	William T. Dwyer High	Riviera Beach Prep & Achievement Academy	2/5/2016	2/10/2016	2
74	William T. Dwyer High	Riviera Beach Prep & Achievement Academy	2/19/2016	2/24/2016	2
75	Congress Middle	Gold Coast	2/12/2016	2/16/2016	1
76	Congress Middle	Gold Coast	10/2/2015	10/6/2015	1
77	Woodlands Middle	Gold Coast	2/26/2016	3/1/2016	1
78	Lantana Middle	Intensive Transition South	4/1/2016	4/5/2016	1
79	Tradewinds Middle	Intensive Transition South	5/2/2016	5/4/2016	1
80	Woodlands Middle	Intensive Transition South	3/14/2016	3/16/2016	1
81	Glades Central High	Crossroads Academy	9/28/2015	9/30/2015	1
82	Glades Central High	Crossroads Academy	9/28/2015	9/30/2015	1
83	Glades Central High	Crossroads Academy	9/21/2015	9/24/2015	1
84	Limestone Creek Elementary	North Transition Elementary	3/8/2016	3/10/2016	1
85	John F Kennedy Middle	Turning Points Academy	11/12/2015	11/17/2015	1
86	Palm Beach Gardens High	Riviera Beach Prep & Achievement Academy	7/24/2015	8/18/2015	1
87	William T. Dwyer High	Riviera Beach Prep & Achievement Academy	9/24/2015	9/28/2015	1

* Students' names were removed to protect their identity.

Exhibit 2
Student Support Plan (PBSD 2007) (Front)


 THE SCHOOL DISTRICT OF PALM BEACH COUNTY DEPARTMENT OF DROPOUT PREVENTION/ ALTERNATIVE EDUCATION (DOP/AE)	Student Support Plan			<input type="checkbox"/> Juvenile Justice Program <input type="checkbox"/> Academic Intervention <input type="checkbox"/> Teenage Parent Program <input type="checkbox"/> Behavior Intervention <input type="checkbox"/> Therapeutic Program <input type="checkbox"/> Outside Agency	
	Name (last, first, middle initial)		Student Number	Date of Birth	Today's Date
Dropout Prevention/Alternative Education School/Program		Location #	Start Date	Exit Date	
Receiving School		Grade Level	Updated Dates		
			PMP	504	
Prior to or during the exit staffing meeting, the sending school/ program, in consultation with the receiving school, completes the following information:					
Student's preferred learning modalities			Receiving school mentor / support counselor		
Recommended Strategies (indicate 'NA' if not applicable; see examples on page 2)					
Classroom Environment		Interpersonal Behavior			
Lesson Presentation		Small Group Behavior			
Student Work		Responding to Instructions/Authority			
Assessment/Testing		Following Rules & Expectations			
Motivation/Effective Reinforcers		Effective Behavior Consequences			
Other / Comments					
Special conditions for return, i.e. performance contract, special progress reports (attach copies if applicable)					
_____ <i>Signature of Sending School Representative</i>		_____ <i>Date</i>	_____ <i>Signature of Receiving School Representative</i>		_____ <i>Date</i>
PBSD 2007 (Rev. 8/31/2007)		ORIGINAL - Receiving School	COPY - Student's DOP/AE Folder		Page 1 of 2

Exhibit 2

Student Support Plan (PBSD 2007) (Back)

Examples of strategies that may be used to complete *Student Support Plan (PBSD 2007)* for the individual student:

<p>Classroom Environment</p> <ul style="list-style-type: none"> • Use regular classroom routines that provide structure to class period/day • Limit proximity to distractions (window, door, other students) • Seat next to peer "study-buddy" • Provide legitimate reasons to move around classroom • Seat close to teacher • Identify a quiet area where student may go when necessary 	<p>Interpersonal Behavior</p> <ul style="list-style-type: none"> • Provide counseling or coaching (individual/small group) for special needs • Make sure student has communication and social skills needed to handle peer interactions (alternate responses to situation/role play) • Make sure student has skills needed to avoid peer conflict • Make sure student knows which adult can assist him/her in problem situations and how to access assistance • Provide role model Prevent over-stimulation • Intervene early to avoid more serious behavior
<p>Lesson Presentation</p> <ul style="list-style-type: none"> • Include components directed to the student's learning modality/style • Give student a preview of what is going to happen during class • Connect new concept to student's previous knowledge • Provide oral and written instructions • Provide copy of notes prior to presentation • Use advance organizer • Ask for paraphrasing when checking for understanding 	<p>Small Group Behavior</p> <ul style="list-style-type: none"> • Make sure student has communication and social skills interaction needed for group • Assign specific role and responsibility • Monitor participation • Let student work with trained classmate to help keep on task • Allow partial participation in cooperative groups
<p>Student Work</p> <ul style="list-style-type: none"> • Use prearranged signal to gain attention before giving directions • Identify "study buddy" who can repeat and explain directions • Provide ways for student to self-monitor or check assignments • Provide a variety of activities that address student's learning style • Provide choice of assignments • Have folder of assignment instructions readily available in classroom • Make sure student knows how to take notes • Give student time to take notes • Allow student to copy notes from "study buddy" • Monitor student's use of homework log/journal/planner • Have student use rubric/checklist to keep track of parts of lengthy assignment • Provide adequate time to complete assignment • Provide immediate feedback • Make sure student knows how to get questions answered during independent or group work periods (remind daily if necessary) • Check student's planner for accuracy or provide copy of instructions including due dates • Call on student when he/she can answer successfully. • Provide advance notice of when you plan to call on student or ask student what he/she is prepared to share with class • Allow student to attempt something new in private 	<p>Responding to Instructions/Authority</p> <ul style="list-style-type: none"> • Remain calm • If student does not respond to you, get assistance from someone he/she responds to • De-personalize rules or instructions -Provide student with choices, not ultimatums • Do not use sarcasm or irony • Do not tease student • Deliver redirection as privately as possible • Provide adequate time & space for student to respond appropriately to redirection
<p>Assessment/Testing</p> <ul style="list-style-type: none"> • Provide study guides • Teach/re-teach test-taking strategies • Provide grading rubric that covers all expectations for course • Match assessment format to student's communication/learning style • Provide regular, meaningful feedback 	<p>Following Rules & Expectations</p> <ul style="list-style-type: none"> • Make sure student understands your expectations and consequences (daily, if necessary) • Allow student to question directions or instructions when not understood • Praise for following request/directions or meeting expectation • Be consistent • Discuss rule changes with student • Use infraction as teaching opportunity • Intervene early to avoid serious rule infraction
<p>Motivation/Effective Reinforcers</p> <ul style="list-style-type: none"> • Catch student doing something right • Provide immediate reinforcement for meeting expectation • Frequent praise • Allow student to select from reinforcement menu • Maintain on-going communication with parent/guardian • Run errands or give some other responsibility • Fewer items or problems on assignment • Homework "free" pass 	<p>Effective Behavior Consequences</p> <ul style="list-style-type: none"> • Telephone or contact • Loss of privilege • Work detail • Behavior contract specifying • Other

Exhibit 3
Sample "Behavior Intervention Exit Checklist"

Behavior Intervention Exit

- _____ Student Exit Report (Form 1605)
- _____ Exit Staffing Conference Notes (Form 1051)
- _____ Parent notification (Letter)
- _____ Student Support Plan
- _____ Behavior/Academic interventions (contracts, behavior plans, RTI, etc.)
- _____ Expulsion Notification (If applicable)
- _____ Screens A03, A05, A07, A10, A12, A14, A15, A17, A20, A23, and A24.
- _____ No more than one (1) failing grade during the last quarter.
- _____ Course credit must be earned within the semester timeframe.
- _____ No more than 10 absences for last semester of placement.
- _____ No out-of-school suspensions for last quarter of placement.
- _____ No incidents of physical aggression for the last quarter of placement.
- _____ Students must not have no more than three (3) referrals for the last quarter.

_____ Exit recommended

_____ Exit not recommended

Signature

Management's Response
Department of Educational Alternatives



THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FL

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EDDIE RUIZ, Ed.D.
ASSISTANT SUPERINTENDENT

To: Lung Chiu, Inspector General
From: Angela Bess, Ed.D., Director of Educational Alternatives
Date: November 9, 2016
Subject: Response to Draft Audit of Alternative Education Programs
Cc: Keith Oswald, Chief Academic Officer
Eddie Ruiz, Ed.D., Assistant Superintendent, Student Services Equity and Access
David Christiansen, Ed.D., Deputy Superintendent/Chief of Schools



1. No Exceptions Noted in Instructional Time Requirements

Response: Concur with the conclusions

2. No Exceptions Noted for Interim Alternative Educational Setting (IAES) Placement Duration

Response: Concur with the conclusions

3. 87 (13%) of the Students Withdrawn From Sending Schools, But Not Yet Registered at Receiving Schools

Response: Concur with the conclusions

1. The comprehensive schools have the autonomy to make school based decisions regarding enrollment and withdrawal of students. The Department of Educational Alternatives is not advised by the sending school when a student has been withdrawn before the placement process has been finalized.

While there are several variables that may impact student enrollment into the receiving alternative school center, withdrawal from the SAC school before the placement has been executed should not be one of the variables per: the guidelines.

Management's Response
Department of Educational Alternatives

Some of the variables that may cause a delay in enrollment into the alternative setting may include but is not limited to the following:

- Student is enrolled/committed into a Department of Juvenile Justice Residential Program before the alternative placement occurs
- Parent/student may exercise the right to an optional educational setting (i.e., Private or Charter School)
- Parent/student refuses to enroll in the alternative school the student has been assigned to attend due to safety and other concerns
- Parent refuses to allow the student to commute via: public transportation in order to attend an alternative school and is unable to transport the student themselves, resulting in a transportation hardship for the family

2. Corrective actions taken or to be taken

The Department of Educational Alternatives will continue to provide support staff, the Placement Liaison, who convenes and facilitates the staffing consideration meetings for student transition throughout the District. During the meetings, it is the function and responsibility of the placement liaison to coordinate with the sending and receiving school centers to ensure that the students have been registered prior to withdrawal from the comprehensive school center.

- The Placement Liaisons will receive a refresher training regarding follow up procedures after the consideration meeting
- The Department will provide training to all school based leaders on the protocols for placement as outlined in the compliance manual

3. Targeted completion date: On-going

4. Documents Not Maintained for Students Exiting the Programs

Response: *Non- concurrence with the conclusions*

1. (a) Exhibit 2 ~ (The Plan) does not apply in the case of ESE students. Seven of the 13 students identified in the random sample were ESE students and therefore PBSD 2007 does not apply to ESE students. The student IEP documents all support services delineated for ESE students.

Exhibit 2 ~ (The Plan) does not apply for students transferring from one alternative program to another alternative program, they are not exiting but are receiving further services.

(b) Exhibit 3 ~ (The Checklist) referenced in the preliminary and tentative draft is not an official School District of Palm Beach County form/checklist. The Exit Criteria

Management’s Response
Department of Educational Alternatives

Checklist mentioned in the current manual refers to an internal monitoring tool for the Alternative Education Site to ensure students have met exit criteria. As listed in the manual, the official documents needed for general education students exiting alternative programs include the following School District of Palm Beach County forms:

- PBSD 1051
- PBSD 1605
- PBSD 2007

<i>13 Identified Students</i>	
7 ESE Students	Form 2007 not applicable
2 Student Transfers	Form 2007 not applicable <i>Students transferred from a Behavior Program to an Academic Program</i>
3 Reg. Academic Placement Students	Form 2007 not found in files <i>(see corrective actions to be taken)</i>
1 Reg. Academic Placement Student	Student attended one week and never returned to the Alternative site

The Department of Educational Alternatives developed, implemented and has consistently documented student exit transitions via: Department Exit Database for the past three years.

2. Corrective actions taken or to be taken

At the time of the audit, the aforementioned schools were direct reports to the Area Offices. Therefore, the oversight of records maintenance for the five alternative schools was not a function of the Department of Educational Alternatives.

The Department of Educational Alternatives needs the authority to provide direct compliance oversight for the five existing alternative school centers. Thereby ensuring that all required documentation is completed and maintained by the Alternative School Sites and is forwarded to the Comprehensive School Sites through increased levels of Department compliance oversight.

- Alternative School Administrators and key staff will be trained regarding record keeping procedures
- Department of Educational Alternatives compliance staff will develop and implement a records management system for the five alternative school centers
- Department of Educational Alternatives will provide compliance resource support throughout the school year and during exit consideration meetings

3. Targeted completion date: On-going

5. Missing Documentation of Academic Assistance and Support Services for ESE Students

Response: *Concur with the conclusions*

Management's Response
Department of Educational Alternatives

1. At the time of the audit, the aforementioned schools were direct reports to the Area Offices. Therefore, the oversight of records maintenance for the five alternative schools was not a function of the Department of Educational Alternatives.

During the audit process, compliance staff from The Department of Educational Alternatives conducted an internal file review of ESE student records at each of the alternative school centers. While each site location maintained a unique records management system, many of the referenced documents were located and provided to the Inspector General's Office representative via email (*documentation to be provided*).

2. ***Corrective actions taken or to be taken***

As of July 1, 2016, the five alternative school centers are a direct report to the Division of Student Services/Equity and Access. Therefore, records management compliance for the Alternative school centers has become a function of The Department of Educational Alternatives.

- The corrective measures taken by this office during the audit process were inclusive of a compliance file review of student records
- The school's administration was notified of the necessary compliance follow up action steps
- The Department of Educational Alternatives ESE compliance staff will visit the Alternative School Sites on a bi-weekly basis complete Quality Improvement Reviews
- The Department of Educational Alternatives resource staff will train appropriate alternative school center staff on a monthly basis
- The Department of Educational Alternatives will develop and implement protocols for site records management

3. ***Targeted completion date: On-going***